

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

FILED-CLERK
U.S. DISTRICT COURT

2007 FEB 13 PM 12: 07

WHITNEY GUILLORY

§

TX EASTERN-MARSHALL

Plaintiff

§

BY _____

v.

§

CIVIL NO. 2:07cv027

BEAUMONT INDEPENDENT

§

SCHOOL DISTRICT

§

and

§

CARROL THOMAS, Superintendent

§

and

§

FERGUSON PARKER, JR.,

§

Former Band Director

§

JURY DEMANDED

JUDGE WARD

Defendants

§

**DEFENDANT FERGUSON PARKER, JR's
ORIGINAL ANSWER INCLUDING DEFENSES**

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES, Defendant, Ferguson Parker, Jr , pro se, and files this his Original Answer Including Defenses and in support thereof would show the following:

I.
Answer

1. For purposes of this Answer, Defendant Parker denies the allegations set forth in Plaintiff's Complaint ¶ I , Sec. 1

2. For purposes of this Answer, Defendant Parker denies jurisdiction alleged in Plaintiff's Complaint ¶ II., Sec. 4

3. For purposes of this Answer, Defendant Parker denies jurisdiction alleged in Plaintiff's Complaint ¶ II., Sec. 5.

4. For purposes of this Answer, Defendant Parker denies the allegation he has a

propensity for sexually abusing children as set forth in Plaintiff's Complaint ¶ III., Sec. 7.

5. For purposes of this Answer, Defendant Parker denies the allegation he has a propensity for sexually abusing children as set forth in Plaintiff's Complaint ¶ III., Sec. 8.

6. For purposes of this Answer, Defendant Parker denies he is represented by an attorney in this matter as set forth in Plaintiff's Complaint ¶ III., Sec. 9

7. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ IV., Sec. 10.

8. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ IV., Sec. 11.

9. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ IV., Sec. 13.

10. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ IV., Sec. 14.

11. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ IV., Sec. 15

12. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ IV., Sec. 16.

13. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ IV., Sec. 17.

14. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ IV., Sec. 18.

15. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ IV., Sec. 19.

16. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ IV., Sec. 21.

17. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ IV., Sec. 22.

18. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ IV., Sec. 24

19. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ IV., Sec. 25

20. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ IV., Sec. 26

21. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ IV., Sec. 27.

22. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ IV., Sec. 28

23. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ IV., Sec. 29

24. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ IV., Sec. 30

25. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ IV., Sec. 31.

26. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ IV., Sec. 32.

27. For purposes of this Answer, Defendant Parker denies the allegations as set forth

in Plaintiff's Complaint ¶ IV., Sec. 33.

28. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ IV., Sec. 35.

29. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ IV., Sec. 36.

30. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ IV., Sec. 37.

31. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ IV., Sec. 38

32. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ IV., Sec. 39.

33. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ V., Sec. 40.

34. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ V., Sec. 41.

35. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ V., Sec. 42

36. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ V., Sec. 43.

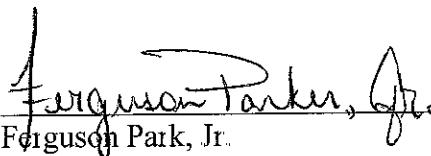
37. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ V., Sec. 45.

38. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ V., Sec. 46.

Defenses

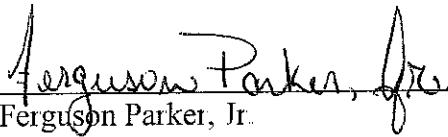
34. Plaintiff's Complaint, in whole or part, fails to state a cause of action.

Respectfully submitted,


Ferguson Parker, Jr.
5750 Sunbird
Beaumont, Texas 77708

Certificate of Service

This is to certify that on February 12th, 2007, a true and correct copy of the above and foregoing document was served on Timothy B. Garrigan, P.O. Box 631902, Nacogdoches, Texas 75963-1902, via CM/RRR


Ferguson Parker, Jr.